

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ANGEL CORTEZ-GRANADOS,

M-11-947

C O M P L A I N T

(T. 8, U.S.C.,  
§ 1324(a)(2)(B)(ii)  
T. 18, U.S.C., § 2)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

LI QIN CHEN, being duly sworn, deposes and states that she is a Special Agent with United States Homeland Security Investigations duly appointed according to law and acting as such.

Upon information and belief, in or about and between February 2011 and May 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANGEL CORTEZ-GRANADOS, together with others, knowing and in reckless disregard of the fact that an alien had not received prior official authorization to come to, enter or reside in the United States, did knowingly and intentionally bring and attempt to bring to the United States such alien for the purpose of commercial advantage and private financial gain.

(Title 8, United States Code, Section  
1324(a)(2)(B)(ii); Title 18, United States Code, Section 2)

The source of your deponent's information and the grounds for her belief are as follows:<sup>1/</sup>

1. Since December 2010, I have been a Special Agent of United States Homeland Security Investigations ("HSI"). In my capacity as an HSI Special Agent, I have been involved in the investigation of numerous cases involving the illegal re-entry of aliens and human trafficking. I am familiar with the facts and circumstances set forth below from my review of the investigative file and conversations with other HSI agents, and from reports of other law enforcement officers involved in the investigation.

2. On or about September 20, 2011, HSI agents encountered the defendant and a young woman from Mexico ("Jane Doe") in the vicinity of Westchester and Purdy Avenues in the Bronx, New York. Both the defendant and Jane Doe admitted to the agents, in substance, that they were residing illegally in the United States. The defendant and Jane Doe were taken into HSI custody based on their illegal immigration status.

3. Jane Doe thereafter was interviewed by HSI agents, and told them, in part and substance:

a. Prior to April 2010, she was involved in a romantic relationship with the defendant in Mexico.

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all of the relevant facts and circumstances of which I am aware.

b. In or about February 2010, the defendant suggested that he and Jane Doe travel to the United States to make money so that they could build a house in Mexico. The defendant, together with others, arranged and paid for Jane Doe and himself to be smuggled into the United States.

c. In February 2010, the defendant and Jane Doe attempted to cross the border, but were stopped by U.S. border patrol officers. In March 2010, the defendant and Jane Doe again attempted to cross the border. The defendant was successful, but Jane Doe was again stopped by U.S. border patrol officers. In April 2010, Jane Doe entered the United States.

d. The defendant and Jane Doe initially lived in North Carolina. The defendant suggested that Jane Doe begin working in prostitution. Although Jane Doe was reluctant to do this type of work, the defendant convinced her to engage in prostitution by telling her, inter alia, that they could not otherwise find work in the United States and that they needed the money to build their house in Mexico.

e. In January 2011, the defendant and Jane Doe moved to New York and began living in the Bronx. Jane Doe worked in prostitution in and around New York City.

f. The defendant took most of the money that Jane Doe earned from prostitution while in the United States.

4. During its investigation, HSI interviewed a witness who informed HSI, in part and substance, that in or about April 2011, Jane Doe went to Queens to meet with a driver who was engaged in the transportation of women to prostitution locations.

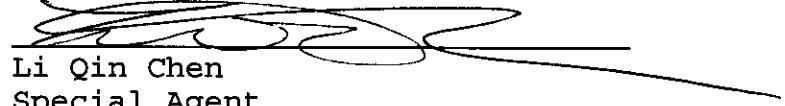
5. During his interview by HSI agents, the defendant admitted, in part and substance, that he, with the help of his family, paid for the defendant and Jane Doe to be smuggled into the United States, and that he and Jane Doe had to repay the smuggling fee.

6. A review of Department of Homeland records reveals, inter alia, that:

a. On or about February 17, 2010, the defendant and Jane Doe were stopped by border patrol officers in Arizona as they attempted to cross the border; and

b. On or about March 25, 2010, Jane Doe was stopped by border patrol officers in Arizona as she attempted to cross the border.

WHEREFORE, your deponent respectfully requests that the defendant ANGEL CORTEZ-GRANADOS be dealt with according to law.



Li Qin Chen  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
\_\_\_\_ day of September, 2011

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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK